



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

October 25, 2022

BY ECF

The Honorable Edgardo Ramos
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *United States v. Neil Cole*,
19 Cr. 869 (ER)


Dear Judge Ramos:

The Government respectfully submits this letter to correct a citation error in the Government's memorandum in opposition to the defendant's motions *in limine*. Specifically, on Page 49 of the Government's brief, the brief erroneously refers to the decision in *United States v. Jackson*, 882 F.2d 1444 (1989), as an opinion of the U.S. Court of Appeals for the Second Circuit; in fact, the decision is an opinion of the U.S. Court of Appeals for the Ninth Circuit. Accordingly, the authority is persuasive but not controlling.

The Government apologizes for the error, which was inadvertent.

Respectfully submitted,

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cc: Defense counsel (by ECF)